

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

FARRAH M. FARR, PHILLIP BROWN  
and KRISTOF & COMPANY, INC.,

Plaintiffs,

v.

KOMMERINA DALING,  
JOHN O'SULLIVAN,  
SARAH WILSON-BRITT, in her  
individual and official capacity,  
MATT TATE, in his individual and  
official capacity, and THE CITY OF  
GAINESVILLE, GEORGIA,

Defendants.

CIVIL ACTION FILE  
NO. 2:22-cv-00133-SCJ

**CONSENT MOTION TO EXTEND THE TIME  
FOR DEFENDANTS TO RESPOND TO THE COMPLAINT**

COME NOW, Defendants Sarah Wilson-Britt and Matt Tate, in their individual and official capacities and the City of Gainesville, Georgia (collectively, “Defendants”), and respectfully request that the Court enter an order extending the time for Defendants to respond to Plaintiffs’ *Complaint for Damages and Injunctive Relief* (the “Complaint”) [Dkt. No. 1] through and including August 15, 2022. Pursuant to Rule 12(a)(1)(A), Defendants’ twenty-one (21) day deadline to respond to the Complaint expires on Monday, August 1, 2022.

Defendants only recently retained counsel and require additional time to prepare a responsive pleading. Defendants request this brief extension of time to respond to the Complaint and state that this delay will not improperly delay the adjudication of this matter. Defendants have conferred with Plaintiffs and are authorized to state Plaintiffs consent to this extension of time to respond.

A proposed order granting the relief requested is attached for the Court's consideration.

This 29<sup>th</sup> day of July 2022.

**PARKER POE ADAMS &  
BERNSTEIN, LLP**

/s/ David L. Pardue  
DAVID L. PARDUE  
Georgia Bar No. 561217  
BRIAN DAVID STOLTZ  
Georgia Bar No. 648725

*Attorneys for Plaintiffs*

1075 Peachtree Street NE  
Suite 1500  
Atlanta, Georgia 30309  
(678) 690-5726  
[davidpardue@parkerpoe.com](mailto:davidpardue@parkerpoe.com)  
[brianstoltz@parkerpoe.com](mailto:brianstoltz@parkerpoe.com)

**FREEMAN MATHIS & GARY, LLP**

/s/ Dana K. Maine  
DANA K. MAINE  
Georgia Bar No. 466580  
NICOLAS D. BOHORQUEZ  
Georgia Bar No. 517380

*Attorneys for Defendants*

100 Galleria Parkway - Suite 1600  
Atlanta, GA 30339-5948  
(770) 818-0000 (telephone)  
(770) 937-9960 (facsimile)  
[dmaine@fmglaw.com](mailto:dmaine@fmglaw.com)  
[acowan@fmglaw.com](mailto:acowan@fmglaw.com)  
[nicolas.bohorquez@fmglaw.com](mailto:nicolas.bohorquez@fmglaw.com)

**CERTIFICATE OF COMPLAINECE WITH LOCAL RULE 7.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

This 29<sup>th</sup> day of July 2022.

*/s/ Dana K. Maine*  
DANA K. MAINE  
Georgia Bar No. 466580

*Attorneys for Defendants*

FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Suite 1600  
Atlanta, Georgia 30339-5948  
(770) 818-0000 (telephone)  
(770) 937-9960 (facsimile)  
[dmaine@fmglaw.com](mailto:dmaine@fmglaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing  
**CONSENT MOTION TO EXTEND THE TIME FOR DEFENDANTS TO  
RESPOND TO THE COMPLAINT** to the Clerk of Court using the Court's  
*CM/ECF* online filing system which will automatically send electronic mail  
notification of such filing and a copy to the following counsel of record:

David L. Pardue  
Brian David Stoltz  
PARKER POE ADAMS & BERNSTEIN, LLP  
1075 Peachtree Street NE  
Suite 1500  
Atlanta, Georgia 30309  
[davidpardue@parkerpoe.com](mailto:davidpardue@parkerpoe.com)  
[brianstoltz@parkerpoe.com](mailto:brianstoltz@parkerpoe.com)

*Attorneys for Plaintiffs*

This 29<sup>th</sup> day of July 2022.

*/s/ Dana K. Maine*  
DANA K. MAINE  
Georgia Bar No. 466580

*Attorneys for Defendants*

FREEMAN MATHIS & GARY, LLP  
100 Galleria Parkway, Suite 1600  
Atlanta, Georgia 30339-5948  
(770) 818-0000 (telephone)  
(770) 937-9960 (facsimile)  
[dmaine@fmglaw.com](mailto:dmaine@fmglaw.com)